



Wycombe District Local Plan (Regulation 19) Publication version

Topic Paper 3: Economic Development

October 2017

Erratum: Economic Development, October 2017

Please note that an error was spotted in Table E2: Wycombe District Council's B use class requirement under the Oxford Economics Forecasts, Experian Forecasts and past trend-based projections of the Economic Topic Paper on page 14.

The total figures for hectares for all three of the forecasts are incorrect and should be 8, 11 and -72 hectares.

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1.0 Introduction

- 1.1 This Topic Paper is one of a series of topic papers to accompany the Publication Version of the Local Plan. Topic papers explain how the strategy has developed and the information, evidence and feedback that has informed the choices made in formulating the policies and also set out what we foresee as the key issues and how these have been resolved. This topic paper deals with how the economic strategy within the Wycombe District Publication Draft Local Plan has developed.
- 1.2 It covers two main areas:
 - A. Employment land provision (2013-33)
 - B. Retail provision – convenience and comparison (2013-33)

Definition of Economic Development

- 1.3 The National Planning Policy Framework (NPPF) defines economic development as development, including those within the B Use Classes public and community uses and main town centre uses (but excluding housing development).

Definition of Retail

- 1.4 Retail uses are those falling within the A Use Classes of the Use Classes Order 1987 (as amended). They include convenience retailing, which cover items purchased regularly such as food, drink, newspapers etc and comparison retailing, which tend to be larger items which aren't purchased frequently and for which people often compare prices before purchasing such as major appliances, televisions etc.

2.0 Policy Context for economic development

National Planning Policy and Guidance

2.1 The National Planning Policy Framework (paragraphs 14, 18 to 22, 23 to 27, 28, 154,160-161,179 and 182) requirements for employment land are summarised in the following bullet points.

- Local plans should positively seek opportunities to meet the development needs of their area, and those needs should be met in full unless the adverse impact of doing so would significantly and demonstrably outweigh the benefits, or specific policies in the Framework indicate that development should be restricted.
- Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
- Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- Support existing business sectors;
- Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;
- Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement.
- Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to

market signals and the relative need for different land uses to support sustainable local communities.

- LPAs should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market;
- Local Plans should be aspirational but realistic;
- One of the purposes of joint working is to enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework;
- The Local Plan should set out the most appropriate strategy;
- Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres.
- Allocate a range of suitable sites to meet the scale and type of retail and office, development needed in town centres. It is important that needs for retail, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;
- Allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the

identified needs in other accessible locations that are well connected to the town centre;

- Set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;
- Apply a sequential approach for main town centre uses including offices and retailing.

2.2 National Planning Policy Guidance (PPG) gives advice on housing and economic development needs assessments (HEDNA) and housing and economic land availability assessments (HELAA). The HEDNA methodology note provides further detail on the components of a needs assessment. In particular, para. 032¹ advises that Plan makers should, in forecasting future trends, consider:

- sectoral and employment forecasts and projections (labour demand);
- demographically derived assessments of future employment needs (labour supply techniques);
- analyses based on the past take-up of employment land and property and/or future property market requirements;
- consultation with relevant organisations, studies of business trends, and monitoring of business, economic and employment statistics.

2.3 In relation to the HELAA methodology, para. 010² advises local planning authorities to consider economic development on sites of 0.25ha (or 500m² of floor space) and above.

¹ Reference ID: 2a-032-20140306 Revision date: 06 03 2014.

² Reference ID: 3-006-20140306 Revision date: 06 03 2014.

- 2.4 In terms of retailing, the NPPG states that local planning authorities should take full account of relevant market signals when planning for Town Centres, and should keep their retail land allocations under regular review. These market signals should be identified and analysed in terms of their impacts on Town Centres. This information should be used to inform policies that are responsive to changes in the market as well as the changing needs of business.

Local Context for economic development

- 2.5 The local context is informed by the Strategic Economic Plan (SEP) refresh (2016-2031), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP), November 2016. The SEP refresh focuses on four key objectives three of which are directly relevant to this Topic Paper - Business Growth and Regeneration, Improved Connectivity and Town Centre Regeneration.
- 2.6 The vision for the Publication Draft Wycombe District Local Plan is taken from the Sustainable Community Strategy for Wycombe District³ and also applies to the Council's Corporate Plan – The vision is, “Wycombe District: economically strong and the place to live work and visit.” In order to achieve this ‘vision’, eight strategic objectives have been identified including one which directly relates to employment land that is headed to “foster economic growth”. Further detail is provided with regard to this objective in that it aims to foster the economic strength of the M40/A404 location and that of the rural economy.

³ Sustainable Community Strategy for Wycombe District 2013-31, Wycombe District Council, June 2014

3.0 How did the strategy develop with regard to the employment land requirements?

- 3.1 The approach to employment land has developed over time and has had to take account of new information and data coming out nationally together with changes to the planning system. The main change being the introduction of permitted development rights to change from office to residential use in particular and the impact that this has had on the supply of office floor space. There have also been revisions to the relevant evidence documents as a result of these changes and other changes as the Plan has developed.

Early Work to Assess Employment Land Needs

- 3.2 In 2013 the Council commissioned Peter Brett Associates (PBA) to undertake an Economic Study and Employment Land Review. The outputs from this work⁴ informed the Local Plan Options consultation (February 2014). This study included several economic forecasts/ scenarios, and a detailed employment land review.
- 3.3 The forecasts at this stage included some high level employment land and floor space growth scenarios and in response to this the Council consulted on some options for major new employment land provision in the District. These are explained later in the employment land section of this paper.

Functional Economic Market Area (FEMA) Work

- 3.4 As with the assessment of housing needs, the initial work on employment needs was superseded by a more collective approach to first identify the Functional Economic Market Area (FEMA) and then assess the needs across the FEMA⁵. The Buckinghamshire districts

⁴ Wycombe District Economy Study & Employment Land Review, Peter Brett Associates, January 2014

⁵ The HMA/ FEMA report (March 2015) acknowledges (on page 11) that there is no single correct way to identify a FEMA. ORS/ Atkins set out in the March 2015 report that they have taken account of best practice and the views of other local authorities as a result of the consultation responses in defining the FEMA. They suggest that Travel to Work Areas should form a key component of the definition but have also carried out

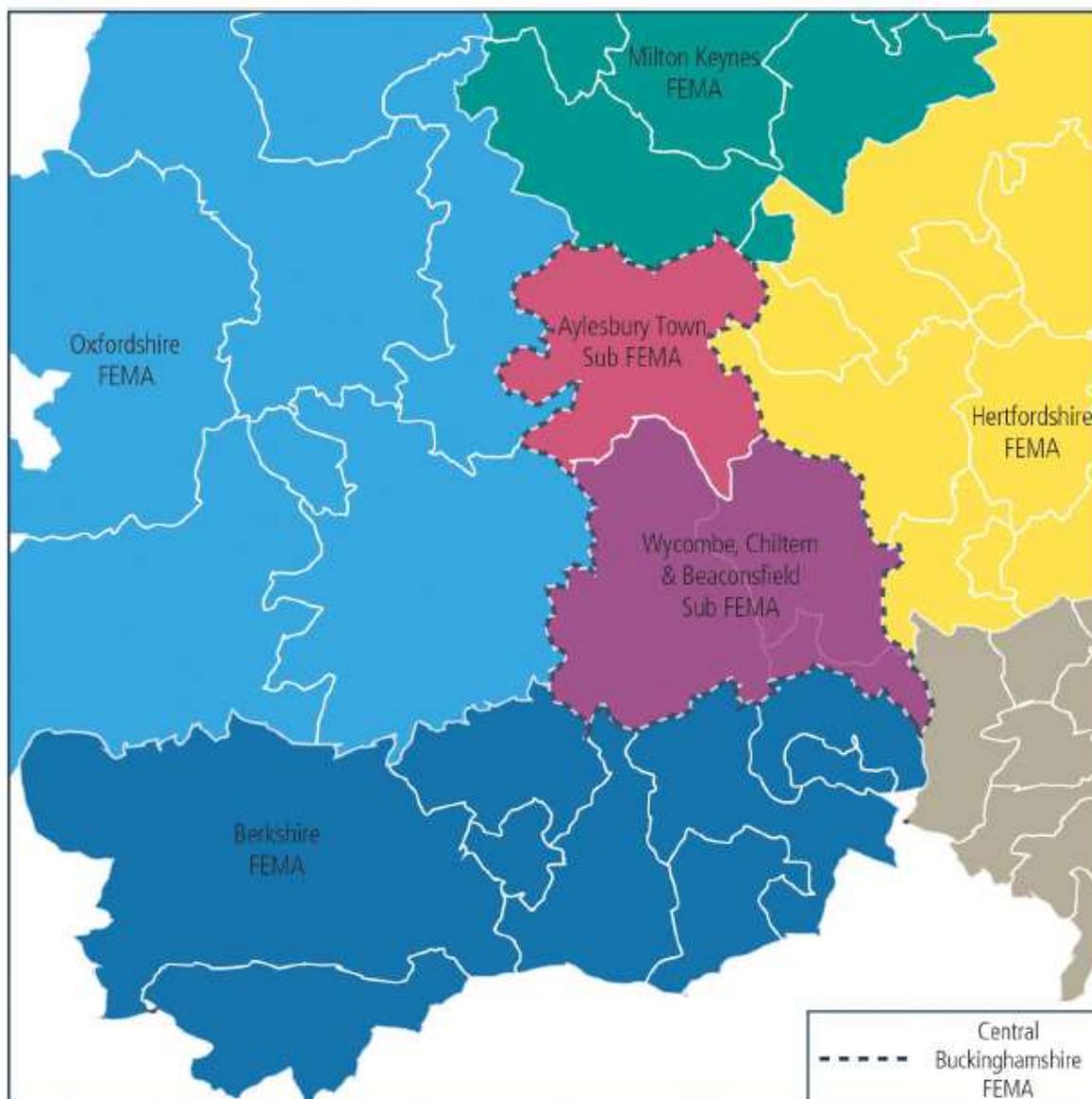
commissioned consultants ORS and Atkins to determine the Housing Market Area(s)/ Functional Economic Market Area that the Buckinghamshire authorities fall within in late 2014, using the published guidance in the National Planning Policy Guidance (PPG).

- 3.5 This commission involved liaison with a wide range of authorities (not just adjoining authorities). The outcome of the work is set out in the 'Identifying HMAs and FEMAs in Buckinghamshire and the surrounding areas' report (March 2015). The March 2015 report concluded that there is a single labour market that meets the tests of self-containment which includes Aylesbury town and its immediate hinterland, all of the Districts of Wycombe and Chiltern, as well as the northern parts of South Bucks.
- 3.6 A subsequent decision in November 2015 by Chiltern and South Bucks District Councils to produce a joint Local Plan led to a revision to the best fit FEMA to include South Bucks district on the basis of a best fit by plan area⁶.

additional analysis of the transport network, local property markets, sectoral composition, supply chains, retail catchments areas and administrative geography to refine and verify the FEMA definition.

⁶ HMAs and FEMAs in Buckinghamshire: The Impact of a Joint Plan for Chiltern and South Buckinghamshire, ORS and Atkins, January 2016

Figure E1: below sets out the FEMA and Sub-FEMA area for Buckinghamshire



- 3.7 A further update to the work was undertaken to take account of more detailed commuting data becoming available from the 2011 Census⁷. This analysis, whilst resulting in changes to the extent of the HMA boundary, didn't alter the conclusions with regard to the area of best fit or the FEMA boundary. Wycombe District falls 100% within the functional FEMA so there is no issue of best fit with Wycombe District.

⁷ HMAs and FEMAs in Buckinghamshire: Updating the evidence, ORS and Atkins, June 2016

- 3.8 The Duty to Cooperate report⁸ explains the engagement undertaken and the outcomes achieved on this work. Whilst there is an issue with the Berkshire authorities regarding whether South Bucks should, on a best fit basis, be part of the Buckinghamshire FEMA or a Berkshire/East Berkshire FEMA (depending on whether you apply a best fit approach to local authority areas or plan making areas), there was no dispute that Wycombe forms part of the Buckinghamshire FEMA, being 100% within the functional HMA identified in the study. Memorandums of Understanding (MoU) with the other Buckinghamshire authorities, Buckinghamshire Thames Valley LEP agree the best fit FEMA and other MoUs with key adjoining authorities, namely Royal Borough of Windsor and Maidenhead and South Oxfordshire agree that Wycombe District and the respective authority are in separate FEMAs.

Assessing the Need for Employment Land

- 3.9 Following the completion of the Buckinghamshire HMA/FEMA work, the Buckinghamshire Districts commissioned ORS and Atkins to undertake a Housing and Economic Development Needs Assessment, incorporating an assessment of the need for employment land/ floor space and associated jobs forecasts as well as calculating the housing OAN. The Buckinghamshire Thames Valley LEP and Buckinghamshire County Council also sat on the steering group for this work.

How did the HEDNA forecast employment need?

- 3.10 In forecasting future economic development needs in the Buckinghamshire FEMA area, the HEDNA, as required by PPG, considers economic activity and labour supply and how this is likely to change over time. In accordance with the PPG's advice the HEDNA also takes account of employment forecasts (on a sectoral basis) and translates these into employment floor space requirements in the FEMA up to 2033.

⁸ Wycombe District Local Plan and the Duty to Cooperate Draft Report, Wycombe District Council, September 2017

- 3.11 Three future employment land need scenarios were developed for the FEMA (2013-2033) including:
- A scenario based on sectoral employment growth forecasts developed by Oxford Economics (labour demand forecast);
 - A scenario based on sectoral employment growth forecasts developed by Experian (labour demand forecast); and
 - A scenario based on the extrapolation of the FEMA's historic employment growth trends.
- 3.12 Both Oxford Economics and Experian forecast future growth in employment by taking account of past growth in employment by sector and expected future performance of different B use class sectors of the economy. They then apply densities and plot ratios to them in order to convert the job forecasts to land requirements. This is set out in more detail in the HEDNA Update (pages 128/129 and Study Appendix D).
- 3.13 Forecasting long-term economic change is always a difficult task. The HEDNA acknowledges that it is not an exact science, and there is no way to accurately and confidently predict future economic change. There are a multitude of economic, technological, social, and political factors (both domestic and international) that can influence the overall employment numbers in an area, as well as the distribution of employment by sector.
- 3.14 In addition to the above limitations, the United Kingdom is currently facing exceptional levels of economic uncertainty as it starts the process of exiting the European Union. At the same time, it faces a significant budget deficit and sluggish levels of growth. This uncertain economic climate makes economic forecasting even more challenging. The forecasts are susceptible to change due to unforeseen circumstances, which can impact on forecast employment growth rates. Even small variations in growth rates could have significant implications for floor space forecasts over a long period. As such, long term

projections should be kept under review as part of the plan making process.

- 3.15 Forecasting employment change at the local (i.e. district) level, brings its own additional set of challenges, as the economic forecasts of all major UK forecasting houses are based on national and regional forecasting models, which in simple terms allocate a proportion of regional growth to each local authority. This is done in a relatively crude way which may not necessarily fully reflect local characteristics.

HEDNA Reports

- 3.16 A draft of the Central Buckinghamshire HEDNA was published for consultation in autumn 2015. This indicated a need for Wycombe District, using the preferred scenario of Oxford Economics, for an additional 7 hectares of employment land in total of which 10 hectares was needed for B1a/b and a further 10 hectares for B8 but there would be a surplus of -12 hectares of B1c/B2 over the 2013-33 period. These figures underpinned the Council's draft Local Plan consultation in June – August 2016 (as part of Regulation 18 plan preparation).
- 3.17 As set out above, a Buckinghamshire HEDNA was published in January 2016, following the decision of South Bucks and Chiltern Districts to produce a joint Local Plan. This report contained the same economic forecasts for Wycombe as the version produced previously in the autumn of 2015.
- 3.18 An update to the HEDNA, was published in December 2016, which revised various elements of the work to take account of more recent data, including the economic forecasts produced by both Oxford Economics and Experian. Table E1 below sets out the updated economic forecasts for each of the local authorities in the FEMA.

Table E1: The Oxford Economics Forecasts for the FEMA from the HEDNA Update (December 2016)

HEDNA Requirement	Use class	WDC		AVDC		CDC/ SBDC		FEMA	
		sq m	ha	sq m	ha	sq m	ha	sq m	ha
	B1a/b	68,000	14	79,600	16	40,200	8	211,200	42
	B1c/B2	-48,000	-12	-25,900	-6	-29,700	-7	-94,400	-24
	B8	34,000	7	86,500	17	31,900	7	173,600	35
	Total	54,000	8	140,200	27	42,400	8	290,400	53

Source: Buckinghamshire HEDNA Update, December 2016

(Positive figures indicate a growth whereas negative figures indicate a projected decline).

3.19 The forecast need for new employment floor space and land in the updated HEDNA as set out in the table E1 above, suggests an increase in the forecast demand for office and warehousing jobs and hence floor space in Wycombe and across the FEMA.

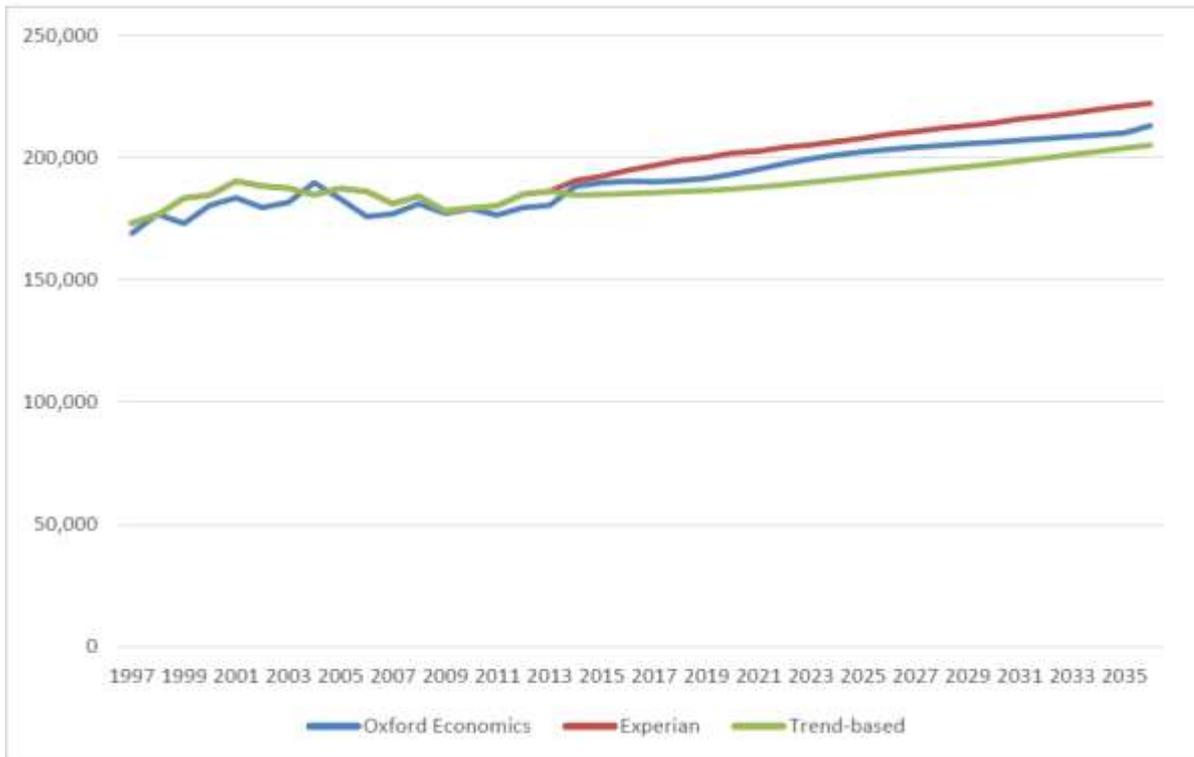
Why we adopted the OE forecast as the preferred scenario

3.20 Oxford Economics' employment projections are higher than the trend-based projections but lower than Experian's. In that sense, the Experian scenario can be viewed as a higher-growth scenario and the trend-based scenario as a low-growth scenario, with the Oxford Economics scenario sitting between the two (but closer to the Experian projections) and providing a more balanced view of the economic growth prospects across the FEMA.

3.21 The market analysis shows there are low levels of vacancy in B8 premises. This suggests there is a good market/demand for B8 premises. The views expressed at the employment land consultation workshop also suggested that there is good demand for B8 premises but current supply is constrained by the availability of sites and existing infrastructure. If further supply came into the market, it is likely it would be taken up. There is therefore good justification for adopting Oxford Economics' B8 growth projections. In contrast, the trend-based scenario forecasts significant levels of B8 decline.

3.22 In terms of B2 employment levels and resulting land demand, the Oxford Economics projections sit between the Experian and trend-based scenarios, providing a more balanced projection of future need.

Figure E2: below shows the FEMA FTE employment across all sectors 1997-2036 (Source: Experian and Oxford Economics)



Source: HEDNA Update, December 2016

3.23 However, the B1a/b office employment levels, as can be seen from Table E2 below, and the resulting land demand, are far higher using the Oxford Economics projections than they would be using the Experian and trend-based scenarios⁹.

⁹ See page 129 of the HEDNA.

3.24 It is clear from this table that the different scenarios result in a wide range of different forecasts of employment need for Wycombe District. In terms of B1a/b office, they range from -10 under the trend based scenario to the highest forecast of 14 hectares, using the Oxford Economics scenario with the Experian forecast sitting between the two at 3 hectares.

Table E2: Wycombe District Council's B use class requirement under the Oxford Economics Forecasts, Experian Forecasts and past trend-based projections

Use Class	Oxford Economics Forecasts (HEDNA Update Dec 2016)		Experian Forecasts (Appendix D to HEDNA 2016)		Trend-based projections (Appendix D to HEDNA 2016)	
	Floorspace (sqm)	Hectares (Ha)	Floorspace (sqm)	Hectares (Ha)	Floorspace (sqm)	Hectares (Ha)
B1a/b	68,000	14	16,000	3	-48,000	-10
B1c/B2	-48,000	-12	-44,000	-11	-143,000	-36
B8	34,000	7	92,000	18	-135,000	-27
Total	54,000	9	64,000	10	-326,000	-73

Note: figures rounded to nearest 1000 and may not sum

Source: HEDNA and its Appendices, December 2016

3.25 In addition to compiling the economic forecasts, Atkins also spoke to commercial property agents and held a stakeholder workshop with local businesses, agents and other interested stakeholders to ascertain their views of the Oxford Economic forecasts findings. In summary the view was that there was no land for B8 uses in High Wycombe and that few permitted B1a office schemes in the County actually get developed. The HEDNA therefore recommends that “taking into consideration the market analysis, stakeholder consultation and review of past employment floor space gains and losses, the Oxford Economics scenario is used as the preferred scenario for informing employment land policies across the FEMA” (para. 6.37).

The HEDNA Addendum

- 3.26 It became apparent from the HEDNA Update (December 2016) and the sharing of information between the Buckinghamshire Districts that there appeared to be a potential significant loss of B1a office space, contrary to what the Oxford Economics forecasts were suggesting. The Buckinghamshire Thames Valley LEP also expressed concern about the forecasts in the HEDNA which, as seen from para. 3.24 above, led to a wide range of forecast employment needs.
- 3.27 Consequently meetings were held with the other Districts in Buckinghamshire together with the Buckinghamshire Thames Valley LEP and Buckinghamshire County Council and it was resolved to commission further work to try and investigate this issue further. The outcome was the preparation of an addendum to the HEDNA.
- 3.28 The PPG states that local authorities should consider the future economic needs of their area based on a range of data and forecasts and consequently for this reason as well as a result of the potential shortfall in employment land that existed in the FEMA, the Buckinghamshire districts together with the Buckinghamshire Thames Valley LEP commissioned an addendum which included:
- Additional forecasts based on the labour supply, past employment completions, property market analysis and local market characteristics built into the labour forecast;
 - Review of employment densities;
 - Considering further views of the commercial property market – this work was undertaken by the Buckinghamshire Thames Valley LEP; and
 - A supply/ demand balance across the FEMA based on the work undertaken by the District Councils on potential employment land supply including employment land losses.

3.29 The main findings of this work are set out below:

Employment forecasts

3.30 In addition to the labour demand scenario, included within the HEDNA, the HEDNA Addendum included a number of alternative forecasts which are summarised below:

3.31 Labour supply scenario – this forecast estimates the future growth of the labour supply and how this might change if some of the housing needs from the southern districts in Buckinghamshire, including Wycombe, were met in Aylesbury Vale instead of where it originates.

Table E3: Wycombe employment land change 2013-33 (hectares) – Labour Supply led Scenario (Note: Figures are rounded and may not sum)

Use Class	Change 2013-2033	
	Floorspace (sqm)	Hectares (Ha)
B1a/b	61,000	12
B1c/B2	-51,000	-13
B8	21,000	4
Total B use class	31,000	4

Source: HEDNA Addendum, September 2017

3.32 Under this scenario, Wycombe District requires a total of 4 hectares of employment land, as opposed to the 8 hectares identified in the Oxford Economics forecast in the HEDNA Update December 2016. As with the Oxford Economics forecast, the majority (12 hectares) is for the office (B1a/b) sector (4 hectares) is for warehousing (B8) and there is projected to be a surplus of 13 hectares of industrial land (B1c/B2)

3.33 Past employment completions data – trends in past development rates were considered by looking at employment floor space gained or lost

through both planning approvals and permitted development schemes over a 10 year period and projected forward to 2033.

Table E4: Past employment completion data scenario for Wycombe District

Use Class	Projected net change 2013-2033 (sqm)	Projected net change 2013-33 (hectares)
B1a/b	-75,800	-15
B1c/B2	-74,800	-19
B8	-25,300	-5
Total B use class	-176,000	-39

Source: HEDNA Addendum, September 2017 and Wycombe District Council for hectares column

- 3.34 Based on this projection, Wycombe would see a net decline in employment land of 39 hectares over the Local Plan period 2013-33. This would occur across all sectors but with the largest losses coming in industrial land (-19 hectares) followed by office (-15 hectares).
- 3.35 Property Market Analysis – in addition to the work on the property market analysis included in the HEDNA, Buckinghamshire Thames Valley LEP produced a report setting out its views on the Buckinghamshire office, industrial and warehousing floor space market and this is included as an appendix to the HEDNA Addendum.
- 3.36 The main conclusions of this report can be summarised as being that the office and to a lesser extent the industrial sector stalled during the recession and values fell significantly, as supply far exceeded demand. Almost 10 years on there is a much lower supply and better demand, but current conditions are not right across most of the FEMA for a significant amount of investment in the office sector and to a lesser extent the industrial and warehousing sector in the near future. A structural change in the office sector is having significant implications for floor space demand and whilst there is activity in the core locations across the region, there is in general terms plenty of supply and little

appetite to add to this amongst institutional investors that drive the market.

- 3.37 Bottom up scenario – This forecast aims to better reflect local market characteristics from both the HEDNA and the property market intelligence from the LEP and build it into the labour demand scenario.

Table E5: Comparison between the findings of the bottom up scenario and the Oxford Economics forecast for Wycombe District

Use Class	Bottom up scenario		Oxford Economics Forecasts (Dec 2016)	
	Floorspace (sqm)	Hectares (Ha)	Floorspace (sqm)	Hectares (Ha)
B1a/b	-32,000	-6	68,000	14
B1c/B2	-20,000	-5	-48,000	-12
B8	-9,000	-2	34,000	7
Total B use class	-61,000	-13	54,000	8

Note: figures rounded to nearest 1000 and may not sum

Source: HEDNA Addendum, September 2017

- 3.38 In Wycombe District under this scenario, employment is projected to decline across all B use classes over the period to 2033, resulting in a total decline of 13 hectares. As a result this scenario projects no additional need for B use class floor space or land over the assessment period.

Conclusion on employment land requirements

- 3.39 It is clear from the above scenarios that, as was also the case in the HEDNA Update (December 2016), the different scenarios used in the HEDNA Addendum result in a wide range of different forecast needs for employment land for Wycombe District in the Local Plan period. For offices, these range from -15 to 12 hectares. In other words, in terms of projected office needs over the 2013-33 period, all of the different scenarios produce forecast need figures which are below those of the

14 hectares derived using the Oxford Economics forecast set out in the HEDNA Update, December 2016.

- 3.40 The decision to go with the Oxford Economics Forecast was a joint one reached by all of the Buckinghamshire authorities as this represented a reasonable basis for identifying employment needs. Further work has identified that other approaches result in negative growth forecasts and that is not a positive approach to planning for economic development.

4.0 Employment Land Supply

Overview

- 4.1 At the same time as developing the evidence of the need for new employment floor space and land, the Council also assessed the potential supply of sites, including assessing various options for new allocations. As with the 'needs' work for employment, this work has also evolved over time.
- 4.2 The scope for identifying new sites for employment land in Wycombe is limited by a number of factors including the significant planning constraints that exist in the District such as the Green Belt and the Chiltern AONB designations as well as other environmental constraints and topographical constraints in terms of the availability of flat sites. As noted in the Strategy Topic Paper, Green Belt, AONB and some other constraints in the District are defined in the NPPF as areas where policies in the Framework where development should be restricted (ie paragraph 14, footnote 9 constraints).
- 4.3 In addition to these, there are also commercial market constraints, whereby there are a limited number of locations that are attractive to the commercial property market. Commercially attractive locations are characterised as being close to existing main centres of economic activity with an educated labour supply, well related and connected to the strategic road network and with accessibility to a range of supporting services.

- 4.4 The Wycombe District Economy Study and Employment Land Review (Peter Brett Associates 2014) undertook a review of employment sites to identify the suitability of those sites to continue in employment use and sites that could be redeveloped for other uses. This was further supplemented by an internal officer review in 2015, culminating in a report to the Council's Cabinet in September 2015¹⁰.
- 4.5 These reports identify that the vast majority of existing employment sites, most of which will have active businesses on, should be retained in employment use. They are very important in providing land for jobs and in support of the local economy more generally.
- 4.6 The consideration of various options for where new employment land might be provided was also informed by some commercial property advice undertaken by Boyer Planning¹¹. This provided advice on the commercial attractiveness of different sites and locations, and the potential quantum of development.
- 4.7 The Delivery and Site Allocations (DSA) Plan, which was adopted in July 2013, focuses on delivering regeneration and improvement to High Wycombe Town Centre, the main settlement of the District, as well as proposals aimed at supporting and improving the second highest tier settlements in the District – Marlow and Princes Risborough town centres. Consequently, the vast majority of sites in these town centres that are suitable for new employment purposes have already been identified and allocated within the adopted Delivery and Site Allocations Plan.
- 4.8 In addition, an analysis of the town centre office market undertaken for the Council by Chandler Garvey (March 2017) helped to provide an indication of the sites most likely to deliver offices, and this helped inform assumptions about likely scale of office development in the town

¹⁰ Short Term Employment Land Review Cabinet Report (September 2015)

¹¹ Wycombe Commercial Assessment, Boyer (January 2016)

centre, as well as identifying an additional site opportunity, the Office World (formerly Staples) site.

- 4.9 The supply of employment land is identified through the Housing and Economic Land Availability Assessment (HELAA) September 2017. All sites identified in the Local Plan have been assessed through the HELAA. Where there are particular constraints such as AONB or Green Belt, additional studies support the site appraisal, these are all referred to in the HELAA (see Appendix 12 of the HELAA for further detail).
- 4.10 A draft HELAA was produced in November 2015. The draft HELAA excluded any sites that were suggested for employment and mixed use purposes that were located in the Green Belt and these sites were then assessed separately in the Green Belt Assessment Part 2 in order to consider whether there were exceptional circumstances to release them from the Green Belt for employment purposes. Sites that passed the Green Belt Assessment Part 2 were then fed back into the HELAA and included as part of the supply of sites when the updated HELAA report was produced in September 2017.
- 4.11 The HELAA report follows the published joint methodology set out in the 'Central Buckinghamshire HELAA Methodology'¹² which is in accordance with the NPPF requirements and follows guidance from the PPG¹³. It is a jointly agreed methodology between the Buckinghamshire districts which make up the Housing Market Area and Functional Economic Market Area¹⁴. The methodology has been adjusted to take account of comments received during the consultation process.

HELAA Report, September 2017

- 4.12 The HELAA (September 2017) identifies (pages 61 to 71) the potential supply of land for employment in the period up to 2033. It draws together the findings from a number of other studies which were used to

¹² [Central Bucks Joint HELAA Methodology \(May 2015\)](#)

¹³ Paragraph: 007 Reference ID: 3-007-20140306 of the PPG

¹⁴ [Housing Market Areas and Functional Economic Market Areas in Buckinghamshire \(March 2015\)](#)

assess the suitability, availability and achievability of potential employment sites in the District such as the Green Belt Assessment, the AONB Site Assessment Report (September 2017), together with the Economy Report¹⁵. It identifies sites that were taken forward in the Plan, as well as sites that were rejected from the supply and the reasons for these sites not being taken forward (Appendix 12).

- 4.13 All sources of supply identified in the Joint HELAA Methodology¹⁶ were considered for employment land. A call for sites exercise took place as part of the Draft Local Plan Issues and Options Consultation (Summer 2016). Whilst a significant number of new housing sites were identified, very few employment sites were promoted. Two existing employment sites were promoted for redevelopment; Highbury Works, Hazlemere (SHZ0005) and the Former Hillside Centre (including Albany House) (SHW0612), High Wycombe. A site adjacent to the A404 at Westhorpe, Marlow was also promoted for employment development. (This site was also previously included as a potential location for employment development in the 2014 Local Plan Consultation). On the whole the consultation showed a low demand for new employment land.
- 4.14 The Highbury Works site and the Westhorpe site are discussed in more detail below in the sources of supply used in the HELAA. The Former Hillside Centre (including Albany House) was not progressed further as the HELAA considered that the fact that it would result in a net reduction in employment land and hadn't been identified as a site suitable for being redeveloped for an alternative use in the employment land reviews meant that it didn't progress beyond stage 1 of the HELAA.
- 4.15 The sources of supply used in the HELAA, September 2017, are set out below:

¹⁵ Wycombe District Economy Study and Employment Land Review (Peter Brett Associates 2014)

¹⁶ Central Bucks Joint HELAA Methodology (May 2015)

Identifying scope for development in the Green Belt

4.16 A Green Belt Assessment was carried out which considered whether there are exceptional circumstances to release land from the Green Belt to meet development needs, including for employment purposes. The outcome of this assessment is set out in the Green Belt Part 2 report. It is clear from iv. below that in undertaking the Green Belt assessment the scale of unmet need, as compared to the Oxford Economics forecast was taken into account.

4.17 As set out in the Green Belt Part 2 report, the Council's position is that, exceptional circumstances will not exist unless all four of the following requirements are satisfied:

- i The location is capable of contributing to sustainable development. This means it must be a logical extension to an existing settlement in Tiers 1-4 as identified in the Settlement Hierarchy . (Settlements in these tiers include all identified transport hubs).
- ii The site is capable of removal from the Green Belt. In this context, a site is considered 'capable' of removal from the Green Belt when its removal from the Green Belt could be acceptable having regard to a) the purposes of including land in the Green Belt, b) the general extent of the Green Belt, and c) the requirement for permanent and robust boundaries. On its own, 'capable' does not mean that there are 'exceptional circumstances'.
- iii The site must also be a deliverable or developable site in the terms set out in para 47 of the NPPF (footnotes 11 and 12) – this means that it is suitable from a detailed sustainability perspective, and has a reasonable prospect of delivery within the plan period, thereby contributing to meeting the OAN. If proposed for employment, the site must similarly have realistic prospects of delivering the proposed allocation within the plan period, having regard to local market indicators and any other relevant factors.

- iv The employment land requirement, as set out in the Oxford Economics forecast in the HEDNA Update (December 2016) is not being met from other sources of supply and the scale of unmet need balanced against the contribution a site makes to the quality and function of the Green Belt weighs in favour of release.
- 4.18 This formed the basis of a four step assessment process.
- 4.19 The results of the above process, including development plan sites identified by officers and assessed in the context of un-met need are set out below.
- 4.20 The Westhorpe site was assessed as part of the Green Belt review. The Review identified that development would cause significant and demonstrable harm to the Green Belt and would have a detrimental impact on the setting of the adjoining Chilterns AONB. As such this site was not taken forward as part of the new Local Plan.
- 4.21 A number of Green Belt employment sites associated with a proposal to create a 'junction 3a' on the M40 (BL0002) (Land South of Heath End Road between High Wycombe and Flackwell Heath) were also considered. However these sites were rejected on the basis that there is no certainty over whether this is the most appropriate solution to improving access to High Wycombe, and further work is being undertaken with Highways England to assess this. Without this junction these potential sites would not be commercially attractive to the market as access would require going from junction 4 of the M40 through High Wycombe town centre, or along non-strategic routes, as such the sites would not have sufficient commercial profile. The sites alone do not demonstrate the exceptional circumstances necessary to be released from the Green Belt and as such do not meet the suitability criteria.
- 4.22 A Green Belt site was promoted by a developer for mixed use including employment and residential at Land off Lane End Road, Adjoining Sands Industrial Estate, Sands, High Wycombe(SHW0558). This site however was assessed in the Green Belt part 2 assessment and found

to meet the purposes of the green belt and as such is a rejected site in the HELAA.

- 4.23 The Green Belt Assessment identifies three sites where there are exceptional circumstances to justify release from the Green Belt for employment development. The sites are the Air Park, Booker (HW16) (two adjoining sites SHW0648 and SHW0649) and Land adjoining High Heavens, Booker (HW17) (SHW0647). These sites have been taken forward into the Publication Draft Local Plan.

Identifying scope for development in the Area of Outstanding Natural Beauty

- 4.24 Sites for employment within the AONB where there was commercial attractiveness were also considered. Most of the settlements within the AONB are villages which do not provide a commercially attractive environment for economic development, however Stokenchurch is an exception to this. This is identified in the Employment Land Review by PBA and also in the Commercial Assessment work as a location that would be suitable for new employment development. Given its close location to the M40 and existing Stokenchurch Business Park, sites in the vicinity of the business park were considered for a business park expansion, initially in the Boyer Commercial Assessment report.
- 4.25 The AONB sites report then assessed a potential expansion of the Business Park (RUR 10) including consideration of whether it constituted major development in the AONB. It concluded that it did not. As a result land to the north of the Business Park (SSC0043) has been identified for economic development in the Local Plan (RUR10). A total of 7,500 square metres of B use floor space has been identified as developable.

Review scope for development in Main Villages outside the AONB

4.26 Sites in Great and Little Kimble and Longwick were reviewed for their development potential. However these locations are not considered suitable for employment and therefore no new sites have been identified.

Review further evidence for the Princes Risborough Expansion Area

4.27 The Princes Risborough Expansion Area was considered for new employment land to support the housing growth in the Boyer Commercial Assessment Report. This concluded that the Princes Estate / Regents Park (PR9) provides the highest quality office and industrial premises in Princes Risborough and that the locational assessment (page 44) indicates that from a commercial perspective promoting the Princes Estate / Regents Park as Princes Risborough's principal employment location is the preferred option. The HELAA concluded that land adjacent to Regents Park, Princes Risborough (SPR0093) is developable for B1c/B2 employment use for 22,000 square metres of floor space. In addition to this, a new local centre (SPR0090) is considered to be developable in the expansion for 300-400 sqm of retail space ('A' use classes) and 500sqm space for business start-ups. This is identified in a broad area. The precise location is subject to detailed master planning of the expansion area.

4.28 In addition to these sites 'Land to the north of Lower Icknield Way' (SPR0092) is identified as a reserve employment site to allow for the relocation of existing local businesses in Princes Risborough. The site is reserved for B1, B2 and B8 uses. Whilst this site is developable, there is no net gain in employment supply as it is to provide an alternative location to employment sites within the expansion area. The SA assesses this site and concludes that "*the allocation of this site supports the economic strategy for the District, providing an alternative location*

for business development which is less constrained and more accessible” than existing locations.

Review developable areas on the former ‘reserve’ sites proposed for inclusion in the Plan

4.29 The reserve sites have been considered for employment use in the Wycombe Economy Study¹⁷ which identified that Gomm Valley and Ashwells (SHW0004) and Abbey Barn South (SHW0429) are both suitable for an element of employment development as part of a mixed use allocation. The study concluded that both sites are in commercially attractive locations. Whilst housing is their main use, two of the former reserve sites are included in the HELAA as being deliverable or developable for an element of employment as well.

Review of site densities

4.30 Densities on employment sites are largely driven by the type of employment use, for example B8 (warehousing) has a much lower density than B1a (office). Rather than looking at densities the HELAA considered existing employment sites in terms of whether there are any vacancies or redevelopment opportunities which may in turn increase the density of an existing employment site. Through this process one site has been identified.

4.31 Highbury Works, Inkerman Drive, Hazlemere (SHZ0005) was promoted and has been assessed for redevelopment and identified to be developable for a net gain of 640 square metres of employment, as well as 14 houses. This increases the density of the site, resulting in a net gain in employment use as well as providing additional housing.

Review Employment Land for housing

4.32 Whilst identifying opportunities for housing from employment land is clearly not directly relevant in this section of the report, it is important to emphasise that the Wycombe District Economy Study and Employment

¹⁷ Wycombe District Economy Study and Employment Land Review (PBA 2014)

Land Review (PBA 2014) identifies that the vast majority of existing employment sites, most of which will have active businesses on, should be retained in employment use. They are very important in providing land for jobs and supporting the local economy more generally.

Review Publicly Owned Land

4.33 The Council owns a number of town centre sites. These have been reviewed for mixed use development, including employment purposes. The findings of the HELAA identifies five council owned sites that are either deliverable or developable for an element of employment. Most of them are mixed use and include an element of employment, alongside housing and retail. These sites are Swan Frontage, High Wycombe (SHW0326); Cressex Island Car Park (Costco), High Wycombe, (SHW0328); Baker Street Car Park, High Wycombe (SHW0337); and Horns Lane Car Park, Princes Risborough (SPR0034). Apart from the Costco site, all of these sites are allocated in the DSA for mixed use development, and the Horns Lane site is now also allocated in the Publication version of the Local Plan.

Other options

- Empty Homes – not applicable.
- Review Scope for Housing Estates Regeneration – not applicable.
- Monitoring update

4.34 Employment completions and commitments have been updated to 1st April 2016. This is set out below in the conclusion section.

4.35 Additional office accommodation at Buckmaster Playing Fields, Cressex was initially promoted at an earlier stage of the plan process. The existing site is public open space and would require relocation of this open space for the site to be suitable. This site was rejected on suitability grounds, as no alternative provision was found to be available for the loss of playing fields.

Conclusions of the HELAA in relation to land supply

4.36 As set out above (para 4.12), the supply of sites assessed for inclusion for employment purposes in the Local Plan period (2013 – 2033) is set out in the Housing and Economic Land Availability Assessment (HELAA), September 2017 (pages 61 to 71), including sites that were assessed and then subsequently rejected. The supply is made up of the following components:

- a) Existing employment land gains and losses as a result of completions, planning permissions and known office to residential conversions at 1st April 2016. (Employment land monitoring data, Table E6 below);
- b) Assumptions about potential future losses of employment (Table E7 below);
- c) Allocated employment sites in the Delivery and Site Allocations Plan (2013) (Table E8 below);
- d) Recommended sites for inclusion in the Publication version of the Wycombe District Local Plan (Table E9).

4.37 These components are considered below:

Existing employment land gains and losses

4.38 In terms of employment land supply, account needs to be taken of existing employment land gains and losses as a result of completions and outstanding commitments as at 1st April 2016. These include prior approvals, permitted since May 2013 when this change was first introduced. (Sites that have been completed for the years 13/14, 14/15 and 15/16, are under construction and not yet started as at 1st April 2016 and mainly relate to office to residential sites and result in a loss of 32,666 sq.m. of employment land). These are set out in Table E6 below.

Table E6: Employment Land Monitoring Data

Sources of losses and gains		Use classes	Sqm
Comp.	B use class completions since start of Plan Period 2013-16 (net)	B1a/b	- 5,884
		B1c/B2	- 2,550
		B8	- 5,787
UC	Under construction (large and small sites) @ 1/4/16	B1a/b	45,452
		B1c/B2	- 33,588
		B8	- 1,034
NYS	Unimplemented planning Permissions @ 1/4/16	B1a/b	3,353
		B1c/B2	- 10,689
		B8	110
	PD Office to Resi losses to 1/4/16)	B1a/b	- 32,666
		B1c/B2	-
		B8	- 243
	Total of above	B1a/b	10,255
		B1c/B2	- 46,827
		B8	- 6,954

Source: Monitoring data for Wycombe District Council

4.39 It should be noted that this supply includes major employment land commitments such as:

- Handy Cross Hub – 33,000 sq.m. of office development
- Glory Park, Wooburn Green - Phase 1 (completed) provides 6,000sq.m. of office floorspace, Phase 2 (permitted) provides a further 11,000sq.m. of office floorspace.
- Cressex Island, High Wycombe – 8,800 sq.m. of warehousing (part of Costco)
- Former Bartletts site, Desborough - 2000 sq.m. mix of industrial B1/B8

Assumptions about potential future losses of employment

4.40 Understanding the potential losses and gains of employment land is an important component of assessing the overall supply of employment land. The Council worked with the other Buckinghamshire authorities to develop a consistent methodology for assessing employment land losses and gains across the FEMA. Future losses were identified in Wycombe District from three sources of supply:

Permitted development from office to residential (also known as Prior Approvals)

4.41 In Wycombe, as can be seen from Table E6 above, 32,666 sqms has been permitted to change from B1a to residential use since this change was first introduced in 2013. (This figure includes completions, not yet started and under construction permissions (for B1a).

4.42 The approach taken in projecting forward potential losses from this source was to assume that the under construction/ not yet started permissions will take 3 years to complete i.e. up to 2019/20.

4.43 We then applied a cautious approach by assuming a 50% reduction to the end of 2023/24 as it was considered that fewer sites would become available from this source over time. We then applied a 25% reduction from 2024/25 to the end of LP i.e. 9 year period.

Small sites projected losses – these are sites below the HELAA site size threshold of 0.25ha/ 500 sqms;

4.44 These were calculated by looking at completions over a 5 year period which led to a net loss of employment land. In Wycombe, for the B1a/b uses we only included losses to non-residential uses to avoid double counting the Permitted Development losses. We then excluded sites which were larger than 0.25 hectares/ 500 square metres. From this we

calculated an annual rate for each of the categories. These were then multiplied by 14 (the remaining years of the plan period) to get the amount from the Local Plan period i.e. assumed that the existing commitments (UC/ NYS) would take three years to build out to get to the end of the Local Plan period.

Sites identified as unsuitable for ongoing employment use

- 4.45 These are sites identified for release to residential purposes based on the Council's Economy Study and Employment Land Review (PBA, 2014) and Short Term Review of Employment Sites (September 2015).
- 4.46 In addition to losses, gains are made from long term vacancies on existing employment sites being taken up. The draft PAS guidance note¹⁸ suggests that where vacant floor space in a district is over and above the typical vacancy rate (of 7.5%) this could meet some of the demand for floor space (and should be included in the supply balance as a positive figure). Where vacancy is below the typical vacancy rate, this would count as a further deficit in supply (and would be included in the supply balance as a negative figure). The vacant floor space identified in the HEDNA has been included within the supply in Table E7 below.

¹⁸ Housing & Economic Development Needs Assessment: Technical advice notes - Volume 3 Economic Development, Peter Brett Associates, April 2016

Table E7 – Forecast future gains and losses of employment floorspace for Wycombe District

Supply Type	Employment Use Class	Gain or space (sqm)*
Redeveloped permitted development (office to residential) Losses 2019 to 2033 to residential	B1a/b	-31,033
	B1c/B2	
	B8	
Small site projection to 2019- 2033	B1a/b	-20,720
	B1c/B2	-9,478
	B8	-1,750
Sites identified as unsuitable for ongoing employment use	B1a/b	-694
	B1c/B2	-15,213
	B8	-2,016
Vacant floor space	B1a/b	24,044
	B1c/B2	-9,260
	B8	-4,643
Total of above	B1a/b	-28,403
	B1c/B2	-33,951
	B8	-8,409

*Negative figures are losses and positives are gains

NB: Total figures have been rounded to the nearest 1,000.

4.47 Table E7 above shows that when forecasting potential additional losses and gains in the employment floor space over the Local Plan period (in addition to the monitoring data in Table 6) that we expect losses to occur over the Local Plan period across all sectors with the largest losses in the B1a/b office and B1c/ B2 industrial sectors.

Allocated employment sites in the Delivery and Site Allocations Plan

4.48 Table E8 below sets out the employment allocations in the Delivery and Site Allocations (DSA) Plan. As stated previously these are town centre sites and are all in High Wycombe and are sites identified that should provide new office accommodation, resulting in a total of 17,000 sq.m. of new floorspace.

Table E8: Allocated Employment Sites in the Delivery and Site Allocations Plan (2013)

Allocations in Existing Local Plans	Total Net Floor space	B1a
Easton Street DSA (SHW0322)	6,000	6,000
Duke Street DSA (SHW0332)	4,300	4,300
Swan Frontage DSA (SHW0326)	6,500	6,500
Former Gas Works, Lily's Walk, High Wycombe (SHW0323)	294	294
Total	17,094	17,094

Recommended sites for inclusion in the Publication version of the Wycombe District Local Plan

4.49 In looking for additional employment sites to those already identified in the DSA Plan, we adopted a similar approach to the one taken for housing in that we worked through the various potential sources of supply including consultation responses for additional site suggestions and the results of calls for sites exercises early on in the process. The findings of all of the above is drawn together in the HELAA (pages 61 to 71 and in Appendix 12).

4.50 Table E9 shows that as a result of this process the Council has identified a significant amount of new employment floorspace for allocation in the Publication Draft Local Plan. Of this approximately 14,000 sq.m of new office floorspace, between 47,550 and 49,750 sq.m of industrial floorspace and between 30,009 and 32,209 of warehouse and distribution floorspace. The overall total of between 91,500 and 96,000 square metres of new floorspace which equates to approximately 21 hectares of employment land.

Table E9 Allocations included in the Publication Draft Wycombe District Local Plan (October 2017).

Potential New Allocations	Total Floorspace Sq.m.	B1a/b Sq.m.	B1c/B2 Sq.m.	B8 Sq.m.
Land adjacent to Regent Park, Princes Risborough (SPR0093)	22,000		22,000	
Princes Risborough Local Centre (SPR0090)	500	500		
Airpark 1 Intensification sites 1-3 (SHW0001)	8,000		4,000	4,000
Airpark 2 Southern Expansion Area (SHW0001)	14,200 - 18,600		7,100 - 9,300	7,100 - 9,300
Abbey Barn South (SHW0429)	7,600		7,600	
Land to the rear of Stokenchurch Business Park, Mill Lane (SSC0043)	7,500	1,500	3,000	3,000
Employment Land on Gomm Valley (SHW0004)	8,000	8,000		
Land adjoining High Heavens (SHW0647)	3,250			3,250
Former Staples, High Wycombe (SHW0343)	3,500	3,500		
Costco, High Wycombe (SHW0328)	8,809			8,809
Southern Verco, Chapel Lane, Sands, High Wycombe (SHW0007)	7,700		3,850	3,850
Highbury Works (Hazlemere Coachworks), Inkerman Drive, Hazlemere (SHZ0005)	640	640		
Total	91,699 – 96,099	14,140	47,550 - 49,750	30,009 - 32,209

Note: Reference numbers are HELAA references

5.0 Supply/ Demand Balance

Wycombe District

5.1 The HEDNA Addendum includes within it the supply demand balance for the Buckinghamshire FEMA and this is summarised in Table E10 below. The components of this table for the Wycombe District figures are explained below:

- **Requirement (HEDNA)** - Employment floor space needs are taken from the Oxford Economics forecast in the HEDNA Update using the period 2013-33 (see Table E1 above);
- **Supply** – this consists of the following:
 - Table E6 of this topic paper – The employment monitoring data comprising completions, permissions (not yet started/under construction) including known office to residential changes. All with a base date of 1st April 2016.
 - Table 7 - Forecast future gains and losses of employment floorspace
 - Table 8 – Allocations in the Delivery and Site Allocations Plan;
- **Net Requirement** – Comparing the employment floorspace requirement to the supply identifies the net employment land requirement. NB negative figures show a shortfall in supply whilst positive figures show a surplus.
- **Proposed New Plan Allocations** - These are the proposed allocations included in the Publication Draft Wycombe District Local Plan (October 2017) (see Table E9).
- **Balance Taking Account of Potential Allocations** – This takes the net requirement and adds in the additional floorspace from the Publication Local Plan proposed allocations to give an overall demand/supply balance. An overall negative figure means a shortfall in supply against the HEDNA requirement, a positive figure means a surplus of supply against the HEDNA requirement.

Table E10: FEMA Employment land change 2013-2033 (hectares)

	Use Class	WDC		AVDC		CDC/ SBDC		FEMA	
		sqms	ha	sqms	ha	sqms	ha	sqms	ha
Requirement (HEDNA)	B1a/b	68,000		80,000		40,000		211,000	
	B1c/B2	-48,000		-26,000		-30,000		-94,000	
	B8	34,000		87,000		32,000		174,000	
Supply	B1a/b	-1,000		81,000		-77,000		3,000	
	B1c/B2	-81,000		233,000		-59,000		94,000	
	B8	-15,000		136,000		-66,000		54,000	
Net requirement (shortfall or surplus)	B1a/b	-69,000	-14	2,000	0	-117,000	-23	-208,000	-42
	B1c/B2	-33,000	-8	259,000	65	-29,000	-7	188,000	38
	B8	-49,000	-10	49,000	10	-98,000	-20	-120,000	-24
	Total	-151,000	-32	310,000	75	-245,000	-50	-140,000	-28
Proposed New Plan Allocations	B1a/b	14,000	3	29,000	6	94,000	19	138,000	28
	B1c/B2	50,000	13	63,000	16	12,000	3	125,000	31
	B8	30,000	6	40,000	8	0	0	70,000	14
	Total	95,000	21	132,000	30	107,000	22	333,000	73
Balance taking account of potential allocations	B1a/b	-55,000	-11	31,000	6	-23,000	-5	-70,000	-14
	B1c/B2	17,000	4	322,000	80	-17,000	-4	313,000	69
	B8	-19,000	-4	89,000	18	-98,000	-20	-49,000	-10
	Total	-57,000	-10	442,000	105	-138,000	-28	193,000	45

N.B all figures rounded and may not sum as a result.

Source: HEDNA Addendum, September 2017

- 5.2 Table E10 above shows that overall in Wycombe District, taking account of allocations in the Publication Draft Local Plan, there is a shortage of B use floor space (57,000 sqms) and land (10 hectares) when assessed against the Oxford Economics forecasts in the HEDNA Update December 2016. The majority of the shortfall of 11 hectares/ 55,000 sq.m.in the office (B1a/b) sector with 4 ha/19,000 sq.m. in the warehousing (B8) sector. There is a projected surplus of 4 hectares/ 17,000 square metres in the B1c/ B2 sector. It should be noted that the shortage in B8 warehousing and the surplus in B1c/B2 industrial broadly balance out.
- 5.3 However, as considered earlier in the paper, it is clear from the alternative scenarios considered in both the HEDNA Update and the HEDNA Addendum, September 2017 that a number of alternative scenarios exist for future floorspace needs which result in lower requirements for office floorspace, indeed it is clear from para. 3.39 above that the Oxford Economics forecast at 14 hectares has the highest office requirement for Wycombe District of all of the scenarios considered.
- 5.4 It is clear from the findings of the HEDNA Addendum, as summarised in the text above, that establishing a need figure for new floorspace is not straight forward, for a number of reasons.
- 5.5 The market intelligence suggests that the office market is weak and has been for some time and is the subject of structural change affecting demand. There is the risk that if additional sites are allocated that these sites will not be delivered, and, as the Sustainability Appraisal report notes (page 54), this could potentially undermine the take up of existing commitments and vacant floorspace. The HEDNA Addendum states that “there is an argument for the Buckinghamshire authorities taking a cautious approach to defining and allocating employment land to meet B class employment needs. It is important that the authorities are not planning for demand that ultimately does not manifest itself. Given the market uncertainties at present, and the historic picture in

Buckinghamshire perhaps a prudent approach would be to avoid allocating or releasing significant amounts of employment land with authorities continuing to monitor the market and development of B class employment floorspace, and then managing and reviewing their Local Plans as early as possible.”

- 5.6 Given that the housing strategy for the Plan¹⁹ involves some unmet housing need being provided in Aylesbury Vale District, the labour supply forecast that factors in some of this re-distribution of housing (as shown in Table E3 above) into the forecasts are relevant in terms of the level of employment land need that the plan aims to meet.
- 5.7 Alongside these economic/market uncertainties are the realities of identifying suitable sites in commercially attractive locations that are acceptable when environmental and other planning considerations are taken into account. The Sustainability Appraisal and the HELAA identify sites that have been considered and in some instances rejected due to constraints, including as a result of the Green Belt review. Difficult options including land in the Green Belt have been considered and assessed applying the same assessment approach as assessing sites for housing.
- 5.8 As set out above, the proposed allocations do not provide sufficient land to meet the Oxford Economics forecast, but they do provide a range of sites that are sufficient to meet need, as assessed under a range of other scenarios. The Council has sought to identify sites by reference to the Oxford Economics assessment and to be consistent with policy guidance in the NPPF.
- 5.9 Meeting the full Oxford Economics forecast would involve development of land where NPPF paragraph 14 footnote 9 indicates that development should be restricted ie the Green Belt and the AONB. It would also involve allocating land where the adverse impacts of development would significantly and demonstrably outweigh the

¹⁹ See Housing Topic Paper

benefits, such as Buckmaster Playing Fields. In the circumstances where the market factors bring into question the economic forecasts, there can be little justification in allocating land that would cause such harm or be contrary to policy in relation to nationally recognised planning and environmental constraints.

- 5.10 In all of the circumstances the Council considers that the range and quantum of development proposed in the plan is appropriate.

Position across the FEMA

- 5.11 The NPPF states in para. 179 that one of the purposes of joint working is to “enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework.”
- 5.12 Given the position above, under the Duty to Cooperate it was therefore relevant to consider whether there is scope for unmet employment land needs from Wycombe District to be met within the wider FEMA area. The FEMA authorities had been working closely to understand the overall supply position as well as jointly commissioning the HEDNA work. Table E10 above, sets out the overall demand/supply balance position for the FEMA.
- 5.13 It is clear from this table that, the FEMA as a whole has a shortfall of 208,000 sqm of B1a/b floor space, a shortfall of 120,000 sqm of B8 floor space and surplus of 188,000 sqm of B1c/B2 floor space. Overall this equates to a shortfall of 140,000 sqm or 28 hectares of land.
- 5.14 However, this does not take into account potential allocations. Table E10 shows that potential new allocations (identified by the Buckinghamshire authorities) across the FEMA are equivalent to 333,000 sqms of floor space or 73 hectares of land which in total would be enough to not only meet the shortfall in the FEMA but would create a significant surplus (45 ha) of employment land, and this land broadly

balances out the potential shortfall in the three southern districts. However, looking at the floor space type the potential allocations²⁰ Table E10 shows an undersupply of land for B1a/b (14 ha) and an undersupply of land for B8 (10 ha), whilst land for B1c/B2 is significantly more than required (69 ha).

- 5.15 The HEDNA Addendum (September 2017) brings all of these components of the employment work together. It concludes by saying that the HEDNA provides a justification as to why the Oxford Economics forecast is the preferred forecast for planning employment needs, particularly compared to the past trends and Experian forecast scenarios. But that nevertheless, other evidence must be considered such as the property market evidence, rather than solely relying on a jobs growth forecast. This approach is in accordance with the advice set out in the PPG.
- 5.16 In addition, as noted in paragraph 5.5 above the HEDNA Addendum suggests a prudent approach to allocations. It goes on to say that “There are also potential factors such as the development of planned infrastructure (for example the Oxford Cambridge Expressway), that might also mitigate against radical changes in B class floor space provision to meet a jobs forecast which is not being translated into demand for B class employment floor space at present.”
- 5.17 In the light of the overall FEMA position and the outcomes from the HEDNA Addendum work, a Memorandum of Understanding has been agreed²¹ between Wycombe, Aylesbury Vale, Chiltern and South Bucks Districts and the Buckinghamshire Thames Valley LEP. This sets out that a flexible approach to the provision of employment land should be adopted.
- 5.18 Practically speaking this flexible approach means that the Council will be allowing, where the land is suitable, a range of B use class uses on

²⁰ By comparing the net requirement to the potential allocations e.g. B1a/b requirement is -42 ha (shortfall) + 28 ha of potential B1a/b allocations = -14 ha (shortfall)

²¹ Signed 13th July 2017. See Appendix 1 to the Duty to Cooperate Report, September 2017

its employment sites and not restricting sites to particular use classes. This recognises that the overall approach across the FEMA broadly delivers sufficient land for economic growth, taking into account a range of factors including an element of redistribution of growth from the three southern districts into Aylesbury Vale, to take account of their shortfalls due to their constrained nature.

Approach to Employment Land in the Publication Draft Wycombe District Local Plan

- 5.19 The District Council's approach in the Local Plan is to accept the HEDNA Oxford Economics forecast with a degree of caution. The Plan does not identify sufficient land, having regard to significant potential employment land losses, to meet the Oxford Economics forecast in the HEDNA Update (December 2016) in full. However, across the FEMA as a whole, there is broadly sufficient land to meet the forecasts, albeit still with some mismatch between the different B use classes, as set out in the Buckinghamshire MOU ²².
- 5.20 Taking account of all of the above, the approach to employment land in the Publication Draft Wycombe District Local Plan can be summarised as follows:

Protect the most important employment sites

- 5.21 Our approach to employment land is therefore to identify the most important employment sites in the District and designate them as either Strategic or Local Employment Areas (under Policy DM28 – Employment Areas) and to restrict uses outside the B use classes on these sites. The Council will be taking a flexible approach in relation to B uses on these sites, in accordance with the advice set out in para. 2.77 of the HEDNA Addendum, by allowing a range of B use class uses on these sites, where the land is suitable. Only limited amounts of employment land are proposed to be released to housing, having

²² Buckinghamshire Memorandum of Understanding between Aylesbury Vale District Council, Wycombe District Council, Chiltern District Council, South Bucks District Council, and Buckinghamshire Thames Valley Local Enterprise Partnership (July 2017)

regard to the evidence from employment land reviews²³ and the shortfall of employment land against the forecasts discussed above.

Allocating additional employment sites

5.22 In addition, the Publication Draft Local Plan allocates a further 21 hectares or just under 100,000 square metres of B class employment land and floorspace. It is clear from Table E9 above, that in proposing these additional sites that an indication has been given as to which uses we would expect to see developed on these sites. However, it should be noted that these allocations are flexible with regard to these sectors in order to deal with changing market conditions. These new sites are:

- Releasing land from the Green Belt at Wycombe Air Park for intensification of employment uses on the site for approximately 15 hectares.
- Releasing land from the Green Belt for low density yard based employment at High Heavens for approximately 4 hectares.
- An extension to the Stokenchurch Business Park of 3 hectares.
- Provision of new employment land at Princes Risborough.
- Employment associated with the Reserve Sites.
- An additional town centre office allocation in High Wycombe.

5.23 These sites are considered to be in good locations offering access to the motorway and trunk road network or otherwise accessible, and to offer a better range of options to improve the quality of the employment sites in the District than in previous plans.

Other additional measures

5.24 In addition to the measures already referred to above, the Plan also seeks (through Policy CP5 – Delivering Economic Prosperity) to:

²³ Wycombe District Economy Study & Employment Land Review, Peter Brett Associates, and Short Term Employment Land Review Cabinet Report (September 2015)

- Regenerate existing key business sites and areas including Globe Park (Policy MR7) and Cressex Business Park (HW18) through improved access, addressing on site issues such as car parking and improving their environmental quality and attractiveness;
- Deliver permitted major proposals for office development at Handy Cross Hub and sites available in High Wycombe Town Centre for office development; and
- For rural areas, facilitate rural enterprise and diversification.

5.25 In addition, whilst not a part of the Plan, the Council through its landownership/property function is also seeking to ensure new business development is delivered. For instance the Council owns the Handy Cross Hub site and has obtained planning permission for the largest office development in the District which it is now seeking to deliver. The office development proposals at Handy Cross Hub (HXB) have the potential to elevate the way in which the market views the town, and this improved perception may well have a benefit for the town centre.

5.26 Wycombe District Council has a strong track record of supporting growth through regeneration and development. At Cressex the Council has supported Basepoint, a managed office workspace facility that accommodates around 70 businesses on flexible terms. Managed workspace is also being developed in containerised developments at Baker Street ('DesBox') and at Hughenden ('Hqube') for entrepreneurs to start up and grow their businesses.

5.27 In addition at its meeting on 18th September 2017, the Council's Cabinet agreed that, in order to help prevent the loss of employment land, it would provide additional funding in the Capital Programme for 2017/18 to purchase the Glory Park site, an important employment site in Wooburn Green. It was agreed at Full Council on 9th October 2017 to seek compulsory purchase powers if necessary.

- 5.28 The Council is also working to tackle and overcome constraints to growth in existing locations such as the Globe Business Park in Marlow and the Cressex Business Park in High Wycombe where traffic congestion, limited public transport services, parking problems and the quality of the public realm environment can act as a disincentive to new investment.

6.0 Conclusions on Employment Land

- 6.1 The Council considers that the Local Plan sets out the most appropriate strategy with regard to employment land in accordance with the NPPF (para. 182).
- 6.2 The employment land requirements for Wycombe District have been assessed using a number of different scenarios and the range of outcomes, as set out in this paper, demonstrate that there is currently a great deal of economic uncertainty. Forecasting long-term economic change is always a difficult task. The United Kingdom is currently facing exceptional levels of economic uncertainty as it starts the process of exiting the European Union. This uncertain economic climate makes economic forecasting even more challenging.
- 6.3 The Council has considered all of the potential sources of supply for employment land in the District, including as set out above having considered finding sites within the Green Belt and AONB. As a result the Council have allocated an additional 21 hectares of employment land in the Publication Draft Wycombe District Local Plan. However it is considered that to meet the needs identified in the Oxford Economics forecast would cause 'significant harm', in that it would be likely to breach the constraints referred to in para. 14 footnote 9 of the NPPF.
- 6.4 Consequently, despite the best efforts of the District Council to find further employment land in the District due to the constraints of the District, combined with the locational requirements of modern business and taking account of potential losses of employment it is likely that the

full demand, set out in the labour demand forecast in the HEDNA Update (December 2016), will not be met in full in the Local Plan period.

- 6.5 In accordance with the advice in the HEDNA Addendum, Wycombe District Council is taking a cautious approach to defining and allocating employment land to meet B class employment needs so that we are not planning for demand that ultimately does not manifest itself. Given the market uncertainties at present, and the historic picture in Buckinghamshire we want to avoid allocating or releasing significant amounts of employment land for growth that may not materialise, allowing development where the NPPF indicates that development should be restricted or where the adverse impact significantly and demonstrably outweighs the benefit.
- 6.6 In addition, we will be taking a flexible approach on new and existing employment allocations i.e. allow a range of employment uses on sites (where the land is suitable and a range of B class uses are possible).
- 6.7 The market and development of B class employment floor space in the District will however be closely monitored with a view to managing and potentially reviewing the Local Plan as early as possible.
- 6.8 At the FEMA level, it is clear that there is sufficient employment land available to meet demand as there are significant employment allocations and existing commitments in Aylesbury Vale District, including three new Enterprise Zones. However, these allocations are currently not in the sectors where there is predicted to be a shortfall in supply i.e. office and warehousing and consequently a flexible approach needs to be taken to allocating land for employment across the FEMA but if sectoral demand changes there is sufficient land available to meet the labour demand forecast from the HEDNA.
- 6.9 Duty to Co-operate discussions have taken place between the Buckinghamshire authorities. The overall approach, agreed in the MOU that was signed in July 2017, is that across the FEMA there is broadly sufficient land for economic growth taking into account a range of

factors including an element of redistribution of growth from the three southern districts into Aylesbury Vale to take account of their shortfalls due to their constrained nature.

7.0 Retail needs

How did the retail strategy develop?

- 7.1 Nathaniel Lichfields and Partners (now renamed Lichfields) were commissioned by Wycombe District Council to prepare a district wide town centre and retail study in 2014. Lichfields undertook a partial update to the 2014 study, based on the latest population and expenditure projections, and this is included in the 2017 Addendum.
- 7.2 This partial update²⁴ re-assesses the quantitative scope for new retail floor space in Wycombe District and provides an update of the District wide needs assessment for retail floor space up to 2033. The quantitative assessment of the potential capacity for new retail floor space suggests that there is scope for new retail development within Wycombe. The projections take into account recent developments completed between 2013 and 2016 and unimplemented commitments as at 2016. Floorspace projections over and above commitments were calculated for the the following time periods - up to 2023 and then 2023-28 and 2028-33 for both comparison and convenience retailing – as shown in Table R1 below. The projections do not take into account the potential re-occupation of vacant shop units in High Wycombe town centre. The projections also assume the market share and role of each centre will remain unchanged in the future.

²⁴ Wycombe Town Centres and Retail Study Addendum, Lichfields, 2017

Table R1: sets out the completions and commitments for retail floor space that have taken place up to the 31st March 2016 and then projects forwards the demand for retail floor space in the 2016-33 period.

Need Requirement	Completions at 2013-16	Commitments at 2016	2016-2023	2023 - 2028	2028 - 33	Total 2016 -33	Projections 2016-33 + (gross) completions and commitments (rounded)
Convenience							
High Wycombe	4,800	1,500	2,500	1,000	1,000	4,500	10,800
Marlow	0	0	0	0	0	0	0
Princes Risborough	400	0	1,000	100	100	1,200	1,600
District Centres	900	600	100	100	0	200	1,700
Other Wycombe	0	0	0	100	0	100	100
Total	6,100	2,100	3,600	1,300	1,100	6,000	14,200
Comparison							
High Wycombe	12,600	1,200	2,100	13,800	14,700	30,600	44,400
Marlow	0	0	400	600	600	1,600	1,600
Princes Risborough	0	0	200	300	300	800	800
District Centres	100	0	0	100	0	100	200
Other Wycombe	0	0	200	200	200	600	600
Total	12,700	1,200	2,900	15,000	15,800	33,700	47,600

NB All figures are gross and have been rounded.

Source: Wycombe Town Centres and Retail Study: 2017 Addendum Table 5.1 page 7

7.3 The reason for breaking the demand forecasts down into time periods is because of the uncertainty inherent in long term retail floor space capacity forecasting. The 2017 Addendum Retail Report states that “Long term projections beyond 2023 are not only subject to changes in terms of population growth, but also growth in expenditure per capita and growth in turnover efficiencies. Experian's recommended growth forecasts for expenditure and turnover are particularly uncertain and need to be carefully monitored. Small variations in Experian's recommended growth rates (i.e. published annually) can lead to large variations in floor space capacity when projected over a long period, therefore long term projections must be treated with caution and kept under review, particularly projections between 2028 and 2033.”

7.4 As a result, the 2017 Retail Addendum to the 2014 Retail Study specifies (para. 5.7) that “future retail development should be phased and that the identification of opportunities to meet the “medium term floor space projections up to 2023 should be the priority, including the potential to accommodate growth within vacant shop premises.”

- 7.5 Government policy, as summarised above in both the National Planning Policy Framework and National Planning Policy Guidance, is based on the principle of a “Town Centre first” approach whereby development sites within the town centre and the main primary retail area are considered before edge of centre and out of centre locations.
- 7.6 The Council has adopted the Delivery and Site Allocations Plan (DSA) and the intention is for this to sit alongside the new Local Plan²⁵. The focus of the DSA is on town centre proposals and the DSA allocates a number of mixed use sites across the three main town centres of High Wycombe, Marlow and Princes Risborough²⁶, a number of which are considered to have potential for retail development. Given the focus of policy, most site opportunities will have already been considered in the DSA Plan.
- 7.7 The HELAA September 2017 considered the supply of sites for meeting the above forecast retail needs (pages 72 to 77). The majority of the sites included in the supply had already been identified in the DSA Plan as town centre mixed sites. Others have been identified through new planning permissions which included a site at the Cressex Island Car Park (Costco) (SHW0328) and a mezzanine extension to an existing retail store in Loudwater. There are also applications pending on two new retail stores at Tannery Road Industrial Estate and Baker Street (SHW0337).
- 7.8 Some mixed use sites in the DSA Plan such as the Octagon Parade and Easton Street in High Wycombe, for example, have not been counted in the HELAA retail supply because of the uncertainty surrounding their delivery or, in the case of Easton Street, their relative lack of attractiveness for retail given their particular location. They do however have the potential to include an element of retailing.

²⁵ See the Wycombe Local Development Scheme (August 2017)

²⁶ The Princes Risborough allocations are now allocated in the Publication Version of the Local Plan

- 7.9 One further source of supply that was included in the HELAA was vacant floor space. As set out above, no account was taken of vacant floor space in the above need projections. The latest Goad Plan information (August 2016) indicates that there is a high shop vacancy rate in High Wycombe town centre. Taking into account the recent opening of TK Maxx, which has occupied 4 vacant units within the Eden Shopping Centre, there are 73 vacant units within the town centre. The shop vacancy is 17.5% compared with the Goad national average of only 11.4%. Vacant shop units total 12,000 sqm gross.
- 7.10 As indicated in the Wycombe Town Centre Retail Study 2014, a target vacancy rate in High Wycombe town centre could be around 7%, i.e. a typical pre-recession level for relatively successful centres. If this reduction in vacancy rate was achieved then 44 shop units would be re-occupied (around 7,000 sqm gross). Table R4 below compares supply of convenience and retail floor space with need. In taking into account the supply of comparison floor space in High Wycombe town centre the vacant 7,000 sqm of retail floor space has been added to the comparison supply in the town.
- 7.11 The tables (R2 and R3) below set out the potential source of supply for comparison and convenience retailing in the District over the Local Plan period, as identified by the HELAA, September 2017.²⁷

²⁷ There are some differences between Tables R2 and R3 of this Topic Paper and the HELAA as errors were discovered in the table in the HELAA in High Wycombe for both the proposed retail units at Tannery Road Industrial Estate and Baker Street. This Topic Paper corrects those errors and sets out the most up-to-date position with regard to supply and the balance between demand and supply for High Wycombe.

Table R2. Retail Supply by Sites – Comparison

HELAA Reference	High Wycombe	2016-2023	2023-2028	2028-33	Total potential floorspace (gross)
New allocations					
SHW0323	Former Gas Works, Lily's Walk	900	0	0	900
SHW0325	Buckingham House	300	0	0	300
SHW0324	Royal Mail Sorting Office	0	0	800	800
New Allocations Total		1,200	0	800	2,000
Comparison New sites					
SHW0463	Bridge Street, High Wycombe	0	2500	1,300	3,800
SHW0017	Rapid House, High Wycombe	0	0	1000	1,000
SHW0328	Cressex Island Car Park (Costco), High Wycombe	2350	0	0	2350

SLW0032	Tesco, Loudwater	0	0	450	450
SHW0014	Tannery Road Industrial Estate, High Wycombe	-1,700	0	0	-100
Total comparison supply High Wycombe		650	2500	2750	5900
Princes Risborough					
SPR0054	Land fronting New Road	0	700	0	700
SPR0034	Land south of Horns Lane	0	700	0	700
Total comparison Princes Risborough		0	1400	0	1400

Table R3 . Retail Supply by Sites – Convenience

HELAA Reference	Address	2016- 2023	2023- 2028	2028- 2033	Total projection 2016 -2033
Convenience Retail Sites Supply					
High Wycombe					
SHW0328	Cressex Island Car Park (Costco), High Wycombe	2350	0	0	2350

SLW0032	Tesco, Loudwater	0	0	50	50
SHW0337	Baker Street, High Wycombe	1,200	0	0	1,200
SHW0014	Tannery Road Industrial Estate, High Wycombe	1,600	0	0	-100
Total convenience High Wycombe		5,150	0	50	5,200
Princes Risborough					
SPR0032	Land at Princes Risborough Railway Station	0	400	0	400
SPR0090	Local Centre in expansion area	0	400	0	400
SPR0054	Land fronting new road	0	50	0	50
SPR0034	Land south of Horns lane	0	50	0	50
Total convenience Princes Risborough		0	900	0	900

Source: HELAA September 2017

7.12 The text below considers how the availability of the supply of retail sites, identified in the HELAA, compares to demand for retail floor space for each of the main settlements in the District.

Tier 1: High Wycombe

Table R4. High Wycombe overall supply vs demand (square metres)

	2016-23	2023-28	2028-33	Total
Convenience	+950	-50	-1000	-1,000
Comparison	-250	-4,550	-15,700	-15,700*

* includes the 7000 sqms of vacant units which was added in to the 2023-28 period.

These figures are cumulative. A negative value denotes a shortfall in terms of supply against demand whereas a positive value denotes a surplus.

7.13 It is clear from table R4 above, that in the period up to 2023, when medium term floorspace projections should be a priority, there is projected to be a surplus of 950 sqms of convenience retailing in High Wycombe. In relation to comparison there is a small deficit in comparison retailing of 250 sqms. However the Council has made cautious assumption in Table R4 about the take up of vacant units in the town centre by phasing that take up in the period 2023-28, and the likelihood is that some take up of vacant units will happen before 2023. As such the retail forecasts up to 2023 for comparison retail are likely to be met.

7.14 In the period up to 2028 the convenience forecasts are effectively met (there is a small deficit of 50 sq m). There is a deficit of 4,550 sqms of comparison floorspace. As mentioned above in para. 7.10, the vacant floor space that currently exists in High Wycombe of 7,000 sqms has been included in the supply in the 2023-28 period. Consequently we wish to prioritise this source of supply in the period up to 2028 so as to enhance the vitality and viability of High Wycombe Town Centre and consequently do not want to bring forward proposals that would undermine the Town Centre or undermine the take up of vacant units.

7.15 For the Local Plan period, there is expected to be a deficit in convenience retailing of 1,000 sqms and for comparison a large deficit of 15,700 sqms, but as noted above the forecasts are least reliable beyond 2028.

Tier 2: Princes Risborough

7.16 The preferred option for a major residential expansion of the town provides the opportunity for some limited additional retail provision in the expansion area as part of a local centre. However it is considered important that it is not of a scale that would detract from and undermine the vitality and viability of the town centre. As a result large scale retail development in the expansion area is not considered appropriate.

Table R5: Princes Risborough overall supply vs demand (square metres)

	2016-23	2023-28	2028-33	Total
Convenience	-1000	-200	-300	-300
Comparison	-200	900	600	600

7.17 It is clear from table R5 that in the period up to 2023, when medium term floor space projections should be a priority, that there is expected to be a shortfall in both convenience and comparison retailing of 1000 sqms and 200 sqms respectively.

7.18 In the longer term period up to 2028, the deficit for convenience retailing reduces to 200 sqms and there is expected to be a surplus of comparison retailing of 900 sqms.

7.19 For the Local Plan period, there is expected to be a small deficit in convenience retailing of 300 sqms but an oversupply of comparison retailing of 600 sqms.

7.20 Overall however, across the whole plan period there is broadly sufficient floorspace identified across the two categories of convenience and comparison retailing to meet the demand. Whilst there is a shortfall in

convenience floorspace up to 2023 when the forecasts are most reliable, sites are identified in the Publication version of the Local Plan. Some of that floorspace relates to the local centre in the Main Expansion Area (Policy PR7) which, due to the lead in time related to development of that major site means delivery will not happen in the until the middle of the retail phasing periods and it would not be appropriate to bring forward the retail element in isolation from the main development. Likewise it is anticipated that the proposed convenience retail at the Station Site (Policy PR16 of the Plan) is more likely to come forward in the middle phasing period, although it could potentially come forward sooner.

Marlow

- 7.21 The 2017 Retail Addendum Report identified no further need for convenience retail provision in Marlow in the Local Plan period but a further 1,600 square metres, in addition to the existing commitments at the end of March 2016, of comparison floor space of which 400 square metres are needed by 2023, 600 sqms by 2028 and a further 600 sqms by 2033.
- 7.22 The DSA has already considered the scope for retail development in the town centre and the Riley Road site (Policy MR3 of the DSA) in the town centre has been identified as a potential site for a comprehensive mixed use redevelopment. A development brief was adopted for this site in 2009. Given the other uses that need to be accommodated on this site including car parking, the quantum of additional retail floor space as part of any redevelopment may be relatively limited. The only alternative in terms of new provision would be to identify a retail site on employment land, for example at Globe Park, but even assuming a site in this location were to satisfy the sequential test this would result in the loss of employment land and consequently this option was not taken forward.

Rest of District

- 7.23 The 2017 Retail Addendum Report identified a need for a further 300 sqms of convenience in total in the Local Plan period of which 100 sqms is projected to be needed by 2023 and a further 200 by 2028. In terms of comparison retailing, there is a need for an additional 700 sqms in the remainder of the District in the period up to 2033 of which 200 is required by 2023, an additional 300 by 2028 and a further 200 by 2033.
- 7.24 No specific site opportunities are identified in the rest of the District, although small scale proposals are likely to come forward through the development management process.

Conclusion on retail supply/ demand balance

- 7.25 The consideration of additional retail sites for meeting retail demand results in a potential supply of sites that falls short of the forecasts for the whole of the Local Plan period. However, the majority of this shortfall is for comparison retailing in High Wycombe and occurs predominantly in the longer term forecast i.e. after 2028, when the retail forecasts are least reliable.
- 7.26 In the period up to 2023, when medium term retail floor space projections should be a priority, there are only marginal shortfalls in comparison retailing in the supply/ demand balance, and the largest shortfall of 250 sqms occurring in High Wycombe is likely to be addressed by some take up of vacant units. Indeed it is important for vitality and viability of the town centre that there is a strong focus on the town centre to enable the take up of vacant units.
- 7.27 Notwithstanding the inherent uncertainties in forecasting retail need in the longer term, particularly given the changing nature of retailing it is necessary to consider whether there are any other possible sites that can be considered to meet the need by expanding the existing main town centres. This is considered further below:

High Wycombe

- 7.28 The DSA Plan already identifies a number of mixed use allocations which are extensive areas of town centre land. As noted in relation to offices, there are competing land uses for town centre sites. One additional site has been identified in addition to the DSA allocations – the Office World site. This has potential for offices given its prominent location on the approach to the town centre - although there is scope for ground floor retail this would effectively only replace existing provision and not result in much net additional floor space.
- 7.29 Tables R2 and R3 above, set out the DSA allocations and other sites in the town that make up the anticipated supply of retail sites as set out in the HELAA September 2017. There are a few site options that are site allocations in the DSA where at present there are not realistic prospects of delivery or where the assumption is that other land uses will come forward on those sites and hence where the HELAA has not made any assumptions about additional retail floor space coming forward – if that situation changes then there may be some additional potential for retail floor space over and above that set out in this paper.²⁸
- 7.30 As referred to above, High Wycombe Town Centre has a relatively high proportion of vacant retail units and consequently the Council wants to encourage the take up of these units rather than allocating new units so as to rejuvenate the existing centre and not create further competition.
- 7.31 It is important to note in the context of High Wycombe Town Centre that the Delivery and Site Allocations Plan (DSA), as well allocating mixed use sites, also brings forward proposals to bring more fundamental structural change and public realm improvements to the town centre that ultimately will make the town centre a more attractive place not just to visit but also for businesses to invest – see in particular Policies HWTC1 – HWTC3 of the DSA. This change is already in the process of

²⁸ See for instance DSA allocations: HWTC7 Easton Street, HWTC10 Swan Frontage, HWTC11 Hospital site, HWTC16 Oxford Road roundabout

being implemented with the earlier phases of the changes to the road network in the town centre being delivered. As this implementation continues it can be expected that this will increase the attractiveness of the town centre for future investment, potentially encouraging the development of sites in the DSA that are currently not counted in the retail supply figures due to uncertainty over their delivery (see para 7.29 above). It may also help sites to come forward earlier in the plan period and be a driver to ensure vacancy levels are reduced.

7.32 The NPPF and PPG make it clear that the main focus for town centre uses, including retailing, should firstly be within town centres. It is only when these needs cannot be met in town centres that Councils should undertake an assessment of the need to expand town centres. As mentioned above, the DSA considered sites in and around the town centre. It is important to consider again the scope for expanding around the edge of the town centre:

- On the northern side, beyond the railway line opportunities are constrained by extensive residential areas. The only potential land is the “Hughenden corridor” north of Morrison’s. However this land is committed for a range of other uses;
- To the west some retail proposals are already coming forward and the DSA identifies potential sites beyond the Eden centre/bus station;
- To the south the hospital and the university are the main constraints. Policy HWTC11 of the DSA sets out a policy framework for the hospital site but it is not anticipated that retail development will form a part of any future proposals. At present there is no indication that any significant retail opportunities will come forward in this area;
- To the east are the council offices, courts and post office limiting potential in that area. The Council Offices and Royal Mail Sorting Office are an allocation in the DSA (Policy HWTC8) where town

centre uses are acceptable. However at present there is no realistic prospect that proposals will come forward on these sites in the first half of the plan period and only limited allowance is made in the HELAA assessment of retail floor space provision later in the plan period. An eastern quarter regeneration area is already identified in the DSA (policy HWTC7) but this is not a prime retail location and the focus of redevelopment is likely to be a mix of offices and residential. To the south east is the Rye, the main park in town where development would be highly inappropriate.

- 7.33 Government guidance clearly prioritises locating retailing in town centre and edge of centre locations. Given the levels of vacancy in the town centre it is not considered appropriate to allocate sites outside of the town centre as there could be an impact on the vitality and viability of the town centre and reduce the prospects of take up of vacant units in the town centre. It is also likely to undermine the delivery of other key development requirements, particularly B use class land as sites are most likely to be in the main industrial areas. This Topic Paper has already outlined the issues regarding provision of B use class land and as such it is not considered appropriate to undermine the supply of B use class land. The issue applies in relation to retail development on the reserve sites – retail development would undermine the delivery of housing development.
- 7.34 Whilst a combination of the DSA and this Local Plan do not make provision for the full retail demand up to 2033, there is only a relatively small shortfall in provision up to 2028 and the reliability of the forecasts is less after 2023 and particularly after 2028. The site options and opportunities in and on the edge of the town centre have been explored, and a number of sites are allocated. As noted above there may be some limited additional potential from DSA allocations but their scope to provide retail floor space is uncertain and it is not appropriate at this stage to make allowance for them in the assessment of retail floor space supply. Allocation of further land out of the town centre would

have adverse impacts that significantly and demonstrably outweigh the benefits in terms of the impact of the B use class employment land supply, or in terms of housing land supply. Out of the town altogether development would have to take place in areas of constraint where paragraph 14 footnote 9 of the NPPF indicates that development should be restricted.

Princes Risborough

7.35 The DSA identifies two town centre site opportunities which are now incorporated in Publication Version of the Local Plan which also identifies further retail opportunities in both the main expansion area and at the railway station. However the town centre is otherwise tightly constrained by residential development on most sides and Wades Park to the west and therefore there are no further opportunities for expanding the town centre. As noted above when combining the comparison and convenience provision in the Local Plan sufficient floor space is provided to meet the retail forecasts for the town.

Marlow

7.36 The DSA identifies a site opportunity in the town centre. The town centre is however similarly constrained in terms of opportunities with development tight up against the High Street and the parks to the north and the south also constraining development.

7.37 Development on employment areas in the town would similarly undermine the B use class employment land supply and development outside of the town would involve land that paragraph 14 footnote 9 of the NPPF indicates development should be restricted – not just Green Belt and AONB but also significant areas of flood risk.

Overall Conclusion on Retail

7.38 Although some shortfalls are identified in provision against forecasts, mainly towards the end of the plan period, in an attempt to meet this shortfall the Council considered the scope for expanding its town

centres, in line with the advice in para. 23 of the NPPF. However, it is concluded that there is nowhere else for them to expand and there are no other opportunities to meet retail demand elsewhere in the town due to its impact on meeting other needs (employment land and housing). Meeting those needs either elsewhere within the town or on the edge of the town is likely to have an adverse impact that significantly and demonstrably outweighs the benefits, or results in development where the NPPF indicates development should be restricted.